

1 PHILLIP A. TALBERT
2 United States Attorney
3 MATTHEW THUESEN
4 WHITNEE GOINS
5 Assistant United States Attorneys
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
5

6 Attorneys for Plaintiff
7 United States of America
8

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 TRACY ARNETT,
14 DANIEL HOOKER,
15 SANDRO DUVAL, AND
SHELINA BISSETT,

16 Defendants.

CASE NO. 2:24-CR-00068 DC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: November 5, 2024

TIME: 9:30 a.m.

COURT: Hon. Dena Coggins

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18 The United States of America, by and through its counsel of record, and defendants, by and
19 through defendants' counsel of record, hereby stipulate as follows:

20 1. This matter was set for a status conference on November 5, 2024, and time was excluded
21 under the Speedy Trial Act through that date, pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) [Local
22 Code T4]. This case was recently reassigned to the Honorable Dena Coggins.

23 2. The parties now jointly request that this Court continue the status conference to
24 November 15, 2024, at 9:30 a.m., and exclude time from November 5, 2024 through November 15,
25 2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

26 3. The parties agree and stipulate, and request the Court find, the following:

27 a) The government has produced substantial discovery associated with this case that
28 includes investigative reports and related documents in electronic form totaling over

1 approximately [2,000] pages, as well as several video and audio recordings and surveillance
2 photographs. All of this discovery has been either produced directly to counsel and/or made
3 available for inspection and copying.

4 b) Counsel for defendants desire additional time to review the discovery, consult
5 with their clients, review the current charges, conduct investigation and research related to those
6 charges, and otherwise prepare for trial.

7 c) Counsel for defendants believe that failure to grant the above-requested
8 continuance would deny them the reasonable time necessary for effective preparation, taking into
9 account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested outweigh the interest of the public and the defendants in a trial within the date
13 prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
15 et seq., within which trial must commence, the time period of November 5, 2024, to November
16 15, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
17 Code T4], because it results from a continuance granted by the Court at the defendants' request
18 on the basis of the Court's finding that the ends of justice served by taking such action outweigh
19 the best interest of the public and the defendants in a speedy trial.

20 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
22 must commence.

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2 IT IS SO STIPULATED.
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5 Dated: October 11, 2024
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PHILLIP A. TALBERT
United States Attorney

7 /s/ WHITNEE GOINS
8 WHITNEE GOINS
9 MATTHEW THUESEN
10 Assistant United States Attorneys

11 Dated: October 11, 2024
12

13 /s/ MARK J. REICHEL
14 MARK J. REICHEL
15 Counsel for Defendant
16 TRACY ARNETT

17 Dated: October 11, 2024
18

19 /s/ LINDA M. PARISI
20 LINDA M. PARISI
21 Counsel for Defendant
22 DANIEL HOOKER

23 Dated: October 11, 2024
24

25 /s/ MICHAEL E. HANSEN
26 MICHAEL E. HANSEN
27 Counsel for Defendant
28 SANDRO DUVAL

29 Dated: October 11, 2024
30

31 /s/ DANICA MAZENKO
32 DANICA MAZENKO
33 Counsel for Defendant
34 SHELINA BISSETT

35 IT IS SO ORDERED.
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37 Dated: October 16, 2024
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39 Dena Coggins
40 United States District Judge